

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES

*

VS

*

NO. 03-CR-10385-RGS

*

KIRK RINALDI

*

APPEAL BY DEFENDANT DENYING
SECOND MOTION TO WITHDRAW AS DEFENSE COUNSEL

The defendant has requested undersigned counsel to enter an appeal on his behalf to the court's denial of counsel's Second Motion to Withdraw as Defense Counsel. The defendant further seeks to be present in court to be personally heard on the matter. At the request of counsel, the defendant submitted a letter to confirm his request for this appeal which letter was received on July 17, 2006, and is submitted herewith as Ex. A.

Wherefore, in the interest of justice the court should allow defendant's request for a hearing on the subject matter of his request for an appeal in the above matter.

July 17, 2006

/s/ Karnig Boyajian
Karnig Boyajian (BBO#052080)
Defendant's Attorney
One Gateway Center, Suite 315
Newton, MA 02458
Tel. 617-332-2222
Fax. 617-332-2221

CERTIFICATE

I hereby certify a copy of the within motion was this date delivered, faxed and/or mailed postage prepaid to AUSA Christopher Bator, c/o U.S. Attorney's Office, One Courthouse Way, Suite 9200, Boston, MA, 02110.

July 17, 2006

/s/ Karnig Boyajian
Karnig Boyajian